IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR   Master File No. 2:12-MD-02327
SYSTEMS PRODUCTS LIABILITY   MDL 2327
LITIGATION

ETHICON WAVE 3 CASES LISTED IN
EXHIBIT A   JOSEPH R. GOODWIN U.S. DISTRICT
                                                                          JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
SALIL KHANDWALA, M.D. FOR WAVE 3

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion

filed against Salil Khandwala for Ethicon Wave 1, Dkt. 2003 (motion), 2004 (memorandum in

support) and Ethicon Wave 2, Dkt. 2469 (motion), 2470 (memorandum). Plaintiffs respectfully

request that the Court exclude Salil Khandwala's testimony, for the reasons expressed in the Wave 1

and Wave 2 briefing. This notice applies to the following Wave 3 cases identified in Exhibit A

attached hereto.

Dated: September 16, 2016   Respectfully submitted,

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EXHIBIT A

Stevens, Kimberly	2:12-cv-02424
Arnette, Rhonda	2:12-cv-02475
Baker, Dawn	2:12-cv-02476
Rivers, Nancy	2:12-cv-02602
Brusseau, Lottie	2:12-cv-02819
Rutherford, Jamie	2:12-cv-02959
Allmon, Mary	2:12-cv-02999
Book, Mary Diana	2:12-cv-03085
Smith, Julia Grace	2:12-cv-03128

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2016, I electronically filed the foregoing document

with the Clerk of the court using CM/ECF system which will send notification of such filing to

the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett_____
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